

**Jon P. Stride**, OSB No. 903887

Direct Dial: 503.802.2034

Fax: 503.972.3734

E-Mail: jon.stride@tonkon.com

**David M. Weiler**, OSB No. 085639

Direct Dial: 503.802.5766

Fax: 503.972.7466

E-Mail: david.weiler@tonkon.com

**TONKON TORP LLP**

1600 Pioneer Tower

888 S.W. Fifth Avenue

Portland, OR 97204

Attorneys for Plaintiffs AXTS Inc and  
Rainier Arms, LLC

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**(Eugene Division)**

**AXTS INC**, an Oregon corporation; and  
**RAINIER ARMS, LLC**, a Washington limited  
liability company,

Plaintiffs,

v.

**ARMS UNLIMITED INC.**, a California  
corporation; **DANIEL SHAMIE**, an individual; and  
**JOSH SALAMA**, an individual,

Defendants.

Civil No. 6:13-cv-02100-AA

**STIPULATED PERMANENT  
INJUNCTION**

Plaintiffs AXTS Inc and Rainier Arms, LLC ("Plaintiffs") and defendants Arms  
Unlimited Inc., Daniel Shamie, and Josh Salama ("Defendants") hereby stipulate to a permanent

injunction enjoining Defendants, including all partners, officers, agents, employees, and all other persons or entities in active concert or participation with them from:

- a. manufacturing, purchasing or otherwise acquiring, or selling, transferring or otherwise disposing of charging handles that bear the AXTS, RAINIER ARMS or RAPTOR marks that are not manufactured by AXTS Inc;
- b. purchasing or otherwise acquiring, or selling, transferring or otherwise disposing of charging handles that bear the AXTS, RAINIER ARMS or RAPTOR marks that are manufactured by AXTS Inc;
- c. using Plaintiffs' RAINIER ARMS, RAPTOR or AXTS marks or any other confusingly similar mark, whether alone or in connection with other words or symbols;
- d. purchasing or otherwise acquiring, or selling, transferring or otherwise disposing of charging handles manufactured by AXTS Inc that bear trademarks or brands other than the RAINIER ARMS or RAPTOR marks, including those sold by:
  - i. Arsenal Democracy – 48 Commerce Lane, Freeport, FL;
  - ii. Noveske Rifleworks – 594 N.E. E St. Rear, Grants Pass, OR;
  - iii. Head Down Products – 268 Cadillac Parkway (Suite 108),  
Dallas, GA;
  - iv. SWFA.com – 420 Century Way #100, Red Oak, TX;
  - v. Legion Firearms – 1901 Ramcon Dr., Temple, TX; and
  - vi. Warsport – 135 Forest Hills Place, Robbins, NC;
- e. Manufacturing, purchasing or otherwise acquiring, or selling, transferring or otherwise disposing of charging handles that infringe U.S. Patent No. D694,354.

///

This injunction will remain in effect permanently.

DATED: 6/17, 2014.



DISTRICT COURT JUDGE

**STIPULATED BY**

**AXTS, INC**

By: Joshua Underhill  
Its: President  
Date: 04/23/14

**RAINIER ARMS, LLC**

By: \_\_\_\_\_  
Its: \_\_\_\_\_  
Date: \_\_\_\_\_

**ARMS UNLIMITED INC.**

By: \_\_\_\_\_  
Its: \_\_\_\_\_  
Date: \_\_\_\_\_

///

///

///

///

///

This injunction will remain in effect permanently.

DATED: \_\_\_\_\_, 2014.

\_\_\_\_\_  
DISTRICT COURT JUDGE

STIPULATED BY

AXTS, INC

By: \_\_\_\_\_  
Its: \_\_\_\_\_  
Date: \_\_\_\_\_

RAINIER ARMS, LLC

By: John Huang  
Its: CEO  
Date: 04-21-2014

ARMS UNLIMITED INC.

By: \_\_\_\_\_  
Its: \_\_\_\_\_  
Date: \_\_\_\_\_

///

///

///

///

///

This injunction will remain in effect permanently.

DATED: \_\_\_\_\_, 2014.

\_\_\_\_\_  
DISTRICT COURT JUDGE

**STIPULATED BY**

**AXTS, INC**

By: \_\_\_\_\_  
Its: \_\_\_\_\_  
Date: \_\_\_\_\_

**RAINIER ARMS, LLC**

By: \_\_\_\_\_  
Its: \_\_\_\_\_  
Date: \_\_\_\_\_

**ARMS UNLIMITED INC.**

By: Daniel Shemie  
Its: President  
Date: 4/4/14

///

///

///

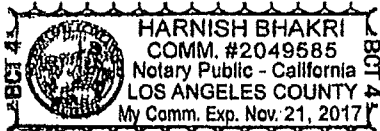
///

///

DANIEL SHAMIE,  
individually

[Signature]

SUBSCRIBED AND SWORN to before me this 4<sup>th</sup> day of April, 2014.



[Signature]  
Notary Public for California  
My Commission Expires: Nov 21 2017

JOSH SALAMA,  
individually

SUBSCRIBED AND SWORN to before me this \_\_\_\_ day of \_\_\_\_\_, 201\_\_.

\_\_\_\_\_  
Notary Public for California  
My Commission Expires: \_\_\_\_\_

**DANIEL SHAMIE,**  
individually

\_\_\_\_\_  
SUBSCRIBED AND SWORN to before me this \_\_\_\_ day of \_\_\_\_\_, 201\_\_.

\_\_\_\_\_  
Notary Public for California  
My Commission Expires: \_\_\_\_\_

**JOSH SALAMA,**  
individually

\_\_\_\_\_  
*[Signature]*

SUBSCRIBED AND SWORN to before me this 2<sup>nd</sup> day of April, 2014.

*[Signature]*  
\_\_\_\_\_  
Notary Public for California  
My Commission Expires: 11/13/2015

